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10 Attorney for Defendant
11 SHERRY RENEE KINCADE

12
13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 1:22-CR-00001-ADA
16 Plaintiff,)
17 vs.) **STIPULATION TO CONTINUE
18 SENTENCING DATE; ORDER**
19 SHERRY RENEE KINCADE) DATE: September 25, 2023
20 Defendant.) TIME: 08:30 a.m.
21) COURT: Hon. Ana de Alba
22 _____)

23 Counsel for Defendant Sherry Renee Kincade, by and through her counsel of record,
24 Assistant Federal Defender Meghan D. McLoughlin, and Plaintiff United States of America, by
and through its counsel of record, Assistant United States Attorney Brittany Gunter, hereby
stipulate as follows:

25 1. By previous order, this case was set for sentencing on September 25, 2023.

26 2. By this stipulation, defendant now moves to continue sentencing until November
27 6, 2023. As this is a sentencing and a change of plea and admission have already been entered,
28 no exclusion of time under the Speedy Trial Act is required.

29 3. The parties agree and stipulate, and request that the Court find the following:
30 a) Defense counsel has been investigating various mitigation documents
31 relevant to sentencing, including medical records regarding Ms. Kincade's medical
32 conditions.

1 b) Ms. Kincade has been seeking treatment and referrals for various
2 conditions, and continues to have appointments and labs through the month of
3 September. The full follow-up of these conditions is important in considering Ms.
4 Kincade's history and characteristics under 18 U.S.C. § 3553(a), among other factors,
5 and the question of sentencing.

6 c) In addition, it is imperative that the nature of her conditions and required
7 treatment are accurately portrayed in the Presentence Investigation Report so that, in the
8 event of her incarceration, the Bureau of Prisons may effectively and efficiently designate
9 her to an appropriate institution and provide further treatment while she is serving her
10 term.

11 d) This is Ms. Kincade's first request for a continuance.

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1 e) Counsel for defendant believes that failure to grant the above-requested
2 continuance would deny her the reasonable time necessary for effective preparation,
3 taking into account the exercise of due diligence.

4 f) The government does not object to the continuance.

5 IT IS SO STIPULATED.

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7 Respectfully submitted,

8 HEATHER E. WILLIAMS
9 Federal Defender

10 Dated: July 20, 2023

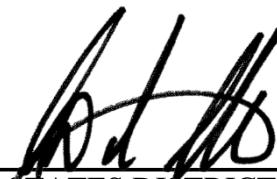
11 */s/ Meghan D. McLoughlin*
12 MEGHAN MCLOUGHLIN
13 Assistant Federal Defender
14 Attorney for Defendant
15 SHERRY RENEE KINCADE

16
17 Dated: July 20, 2023

18 */s/ Brittany Gunter*
19 BRITTANY GUNTER
20 Assistant United States Attorney

21 IT IS SO ORDERED.

22 Dated: July 20, 2023



23 _____
24 UNITED STATES DISTRICT JUDGE